REMARKS

This Amendment, filed in reply to the Office Action dated April 21, 2005, is believed to be fully responsive to each point of rejection raised therein. Accordingly, favorable reconsideration on the merits is respectfully requested.

Claims 1-21 are pending in the application.

Claims 3-5 and 9-11 stand rejected under 35 U.S.C. 112, second paragraph, as being allegedly indefinite for failing to particularly point out and distinctly claim the subject matter. Claims 1-15 stand rejected under 35 U.S.C. 103(a) as being allegedly unpatenable over Rozzi (USP 6,072,589). Claims 18 and 21 stand rejected under 35 U.S.C. 103(a) as being allegedly unpatentable Rozzi in view of Walowit (USP 4,941,038). Claims 16, 17, 19, and 20 are objected to as being dependent upon a rejected base claim, but would be allowable if rewritten in independent form including all of the limitations of the base claims and any intervening claims.

As to the §112 rejection, Applicant hereinabove amends the claims for clarification purposes. The claims are not narrowed in scope.

As to Rozzi, Applicant submitted in the Amendment dated November 12, 2004 that in the claimed invention, it is the second color data representative of coordinates on a common color space, such as XYZ color space, that is smoothed to the first color data representative of coordinates on the device-dependence color space; but in Rozzi, it is the data in an index space, such as a calibrated RGB color space, that is smoothed.

The Examiner's main argument is that since the render table 20 in Rozzi is generated by inverting the measurement table generated by conversion from the independent color space XYZ to the dependent color space RGB, it would have been obvious to one skilled in the art to

consider the smoothing means or step in Rozzi teaches the smoothing of the second color data of

an independent color space (such as XYZ) to the first data of a dependent color space (such as

CMYK) as the claimed invention, since the rendering table is the inverted conversion of the

conversion of data of the independent color space to data of the dependent color space.

Applicant respectfully submits that the rejection is not supportable. Although in Rozzi,

the render table 20 is generated by inverting the measurements table storing index color space

values, the data in the render table is still in the index space, not in the common color space. In

Rozzi, the computer arrangement 10 converts integrated device-independent values into the

index space using the transformation defined by the set of procedures 22 and stores the index

color space values in the measurement table. The computer arrangement 10 then generates the

render table 20 by inverting the measurements table to generate a table of device coordinates

indexed by, for example, calibrated RGB values. For each set of desired calibrated RGB indices,

computer arrangement 10 searches for the measurements table for the index color space values

closest to the desired values. The computer arrangement 10 uses the device coordinates

corresponding to the closest values as the entry in the render table. The computer arrangement

10 optionally applies a smoothing filter to the render table 20 (Rozzi, col. 7, lines 40-61).

Thus, the render table stores device coordinates corresponding to index color space

values closest to the desired calibrated RGB indices. Rozzi does not invert index color space

values in the measurements table back to the device-independent values. Rozzi fails to teach or

suggest smoothing the second color data representative of coordinates on a common color space.

The Examiner has further argued that it is well known in the art whether to smooth the

image data in independent color space or in dependent color space. Because the reference is

based on the concept that smoothing device coordinates rather than device-independent space coordinates, is more effective for reducing the likelihood of discontinuities in printed color gradients, a person skilled in the art would not draw the features as claimed from the art of record.

Walowit, the newly cited reference, talks about smoothing the device independent color input values or output values for discontinuities between <u>subspace</u>, instead of smoothing data representative of coordinates on the common color space to data representative of coordinates on the device-dependence color space. Thus, Walowit fails to supply any deficiency Rozzi.

Accordingly, Applicant submits that claims 1-15, 18 and 21 are also patentable.

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.
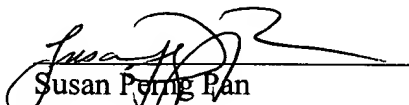
Respectfully submitted,

SUGHRUE MION, PLLC
Telephone: (202) 293-7060
Facsimile: (202) 293-7860

WASHINGTON OFFICE
23373
CUSTOMER NUMBER

Date: September 21, 2005

Susan Peng Ran
Registration No. 41,239

-12-